



U.S. Department of Justice
Civil Division, Federal Programs Branch

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December 15, 2005

By Electronic Mail

Mr. Christopher A. Hansen, Esquire
American Civil Liberties Union
Foundation
125 Broad Street
New York, New York, 10004

Re: ACLU, et al. v. Gonzales, No. 98-5591 (E.D. Pa.)

Dear Chris:

This responds to your letter dated December 12, 2005, which seeks a status update on agreements we reached with respect to certain document requests.

RTP A. We agreed to search for and provide any press releases or other public statements discussing the constitutionality of COPA. We have found responsive documents and will produce them next week.

RTP B. We agreed to provide copies of the indictments in cases involving "pure obscenity." We will produce that information next week. We also agreed to provide data on pure obscenity cases filed by DOJ since 1996. We anticipate providing this information in a couple of weeks. We found section 1 of the "Investigating and Prosecuting an Obscenity Case Seminar" and will produce the document next week. After searching for the other section you inquired about, we have concluded that no such document exists.

RTP Z. We agreed that a privilege log was not necessary for documents produced since the initiation of this lawsuit. To date, we have not located any responsive documents.

RTP EE. We agreed to search for documents concerning the procurement and use of ICF products on DOJ computers. We found responsive documents from the Justice Management

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Division and will produce them next week. We need more time to collect documents from other components, and we will provide any additional documents we receive on a rolling basis.

Sincerely,

/s/

Raphael Gomez
Senior Trial Counsel
Federal Programs Branch
Civil Division